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SPECIAL COUNSEL TO THE KENT RIES, TRUSTEE OF THE MCCLAIN DEBTORS

# IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS LUBBOCK DIVISION

In re:	§
McClain Feed Yard, Inc., et al.,	§ Case No. 23-20084-swe7
Debtors.	§ Jointly Administered §
	§ .
In re:	§ 8
mic.	\$ §
2B Farms, a Texas General Partnership, et al.,	§ Case No. 23-50096-swe12
D.1.	§ Jointly Administered
Debtors.	§
	§

AgTexas Farm Credit Services, AgTexas, PCA, Thorlakson Diamond T Feeders, LP,	§ § §
Plaintiffs,	\$ \$
Edward Dufurrena, et al.,	<b>§</b> §
Intervenor-Plaintiffs,	§ § §
v.	<ul><li>§ Adversary No. 24-02007-swe</li><li>§ Consolidated Adversary Proceeding</li></ul>
Rabo AgriFinance, LLC, et al.,	§ §
Defendants.	§ §
HTLF Bank, as successor to First Bank & Trust,	\$ \$ \$ \$
Plaintiff, Counter-Defendant, and Cross-Claim Defendant,	\$ \$ \$
v.	<ul> <li>Adversary No. 24-02007-swe</li> <li>Consolidated Adversary Proceeding</li> </ul>
2B Farms, a Texas General Partnership, Terry M. Robinson, and Rebecca A. Robinson,	\$ \$ \$ \$
Defendants, Counterclaim- Plaintiffs, Third-Party Plaintiffs and Third-Party Counterclaim Defendants,	Adversary No. 24-02007-swe Consolidated Adversary Proceeding  Adversary No. 24-02007-swe Consolidated Adversary Proceeding  Adversary No. 24-02007-swe Consolidated Adversary Proceeding
v.	\$ \$
Rabo AgriFinance, LLC and Mechanics Bank,	\$ \$ \$ \$
Third-Party Defendants and, as to Rabo AgriFinance LLC only, Third- Party Counterclaim Plaintiff and Cross-Claim Plaintiff.	\$ \$ \$ \$ \$ \$ \$ \$
	8

HTLF Bank, as successor to First Bank & Trust,	§
Plaintiff and Counter-Defendant,	8
v.	\{\{\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\
2B Farms, a Texas General Partnership, Terry M. Robinson, and Angela Robinson,	\$ \$
Defendants and Counter-Plaintiffs.	\{\{\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\

## TRUSTEE'S EXHIBIT LIST FOR HEARING ON MOTION TO INTERVENE AND MOTION TO ENFORCE AUTOMATIC STAY

Kent Ries, Trustee ("<u>Trustee</u>") of the Chapter 7 McClain bankruptcy cases (the "<u>Bankruptcy</u> <u>Cases</u>")<sup>1</sup> files this Exhibit List for Hearing on Motion to Intervene and Motion to Enforce Automatic Stay as follows:

#### I. Exhibits

- 1. The Trustee requests the Court to take judicial notice of the filings in the Debtors' Bankruptcy Cases and related Adversary Proceedings (prior proceedings in this consolidated action, Adv. No. 24-02003, and Adv. No. 25-02005), including the allegations of the respondents to the Trustee's Motion therein.
- 2. The Trustee requests the Court to take judicial notice of the allegations of the respondents in their Proofs of Claim and the supporting documentation they have filed to their claims, including the Proof of Claim filed by Rabo AgriFinance LLC<sup>2</sup>, the Robinsons and their

<sup>&</sup>lt;sup>1</sup> The debtors in the Chapter 7 cases for which Mr. Reis is Trustee are: McClain Feed Yard, Inc. (Case No. 23-20084-swe), McClain Farms, Inc. (Case No. 23-20085-swe), and 7M Cattle Feeders, Inc. (Case No. 23-20086-swe) (hereinafter the "McClain Debtors").

<sup>&</sup>lt;sup>2</sup> See Proof of Claim No. 56, Case No. 23-20084.

general partnership (2B Farms)<sup>3</sup>, HTLF Bank<sup>4</sup>, Thorlakson Diamond T Feeders, LP<sup>5</sup>, AgTexas Farm Credit Services and AgTexas, PCA<sup>6</sup>, and the other 54 parties, referred to as the "Intervenors" in this lawsuit:

Name of Party	POC	POC	POC
	23-20084	23-20085	23-20086
	McClain	McClain Farms,	7M Cattle Feeders,
	Feed Yard,	Inc.	Inc.
	Inc.		
1. AgTexas Farm Credit	#72-2	#84-2 Amended	#71-2 Amended
Services	Amended	Unliquidated	Unliquidated
	Unliquidated	-	
2. AgTexas, PCA	#73-2	#82-2 Amended	#70-2 Amended
_	Amended	Unliquidated	Unliquidated
	Unliquidated	-	
3. Thorlakson Diamond T	#64-2	#68-2 Amended	#62-2 Amended
Feeders, L.P.	Amended	\$9,997,068.00	\$9,997,068.00
	\$9,997,068.00		
4. Dennis Buss	#38	#39	#33
	\$308,873.53	\$308,873.53	\$308,873.53
5. Buss Family Trust	#54	#55	#49
	\$380,090.19	\$380,090.19	\$380,090.19
6. Eddie Bryant	#30	#30	#25
	\$214,820.95	\$214,820.95	\$214,820.95
7. Robert Gray	#34	#35	#29
	\$234,663.23	\$234,663.23	\$234,663.23
8. Ronnie Gray	#28	#28	#23
	\$200,450.00	\$200,450.00	\$200,450.00
9. Gray Brothers	#33	#34	#28
	\$436,533.90	\$436,533.90	\$436,533.90
10.Craig Sutton	#43	#44	#38
	\$400,109.56	\$400,109.56	\$400,109.56
11. Amy Sutton	#43	#44	#38
	\$400,109.56	\$400,109.56	\$400,109.56
12. Steve Ryan	#53	#54	#48
	\$251,609.07	\$251,609.07	\$251,609.07
13. A.J. Jacques Living Trust	#26	#26	#21
	\$365,509.27	\$365,509.27	\$365,509.27

<sup>&</sup>lt;sup>3</sup> See Proof of Claim No. 47, Case No. 23-20084.

<sup>&</sup>lt;sup>4</sup> See Proofs of Claim Nos. 6-9, Case No. 23-50097.

<sup>&</sup>lt;sup>5</sup> See Proof of Claim No. 64, Case No. 23-20084.

<sup>&</sup>lt;sup>6</sup> See Proof of Claim No. 73, Case No. 23-20084.

14. Gungoll Cattle, LLC	#41-2	#42	#36
14. Guilgon Cattle, LLC	Amended	\$495,648.89	\$495,648.89
	\$495,648.89	\$493,040.09	\$493,040.09
15. Leah Gungoll	#42	#43	#37
13. Lean Gungon	\$150,852.24	\$150,852.24	\$150,852.24
16. Morrison Café, LLC	#66	#69	#61
10. Morrison Care, ELC	\$789,452.20	\$789,452.20	\$789,452.20
17. Lesh Family Trust	#86	#90	#74
17. Lesii Faimiy Trust	\$776,745.49	\$776,745.49	\$776,745.49
18. Gary Lesh	#88	#71	#64
To. Gury Desir	\$300,335.37	\$300,335.37	\$300,335.37
19. Jan Lesh	#88	#71	#64
13. Cult Besit	\$300,335.37	\$300,335.37	\$300,335.37
20. Jared Lesh	#62	#66	#59
	\$7,699,133.66	\$7,699,133.66	\$7,699,133.66
21. Joel Brookshire	#59	#61	#55-2 Amended
	\$315,000.00	\$315,000.00	\$315,000.00
22. Gene Brookshire Family,	#57	#58	#51
LP	\$6,500,000.00	\$6,500,000.00	\$6,500,000.00
23. Douglas Finley	#29	#29	#24
	\$99,921.28	\$99,921.28	\$99,921.28
24. Scarlet & Black Cattle,	#68	#74	#65
LLC	\$3,707,039.52	\$3,707,039.52	\$3,707,039.52
25. Janice E. Lawhon	#39	#40	#34
	\$149,488.75	\$149,488.75	\$149,488.75
26. Jordan Lesh, LLC	#87	#62	#56
	\$342,301.95	\$342,301.95	\$342,301.95
27. Bryan Blackman	#31	#31	#26
	\$661,956.48	\$661,956.48	\$661,956.48
28. Steve T Scott Farms Inc.	#58	#59	#53
	\$4,806,566.53	\$4,806,566.53	\$4,806,566.53
29. Scott Livestock	#55	#56	#50-2
Company, Inc.	\$252,689.84	\$252,689.84	\$252,689.84
30. Arnold Braun Trust	#27	#27	#22
	\$562,232.17	\$562,232.17	\$562,232.17
31. Robert Braun	#35	#36	#30
	\$345,547.65	\$345,547.65	\$345,547.65
32. Jim Rininger	#51	#52	#46
	\$240,778.44	\$240,778.44	\$240,778.44
33. Robert Spring	#52	#53	#47
	\$149,812.73	\$149,812.73	\$149,812.73
34. Michael Evans	#36	#37	#31
27.16	\$200,812.14	\$200,812.14	\$200,812.14
35. Miranda Evans	#36	#37	#31
	\$200,812.14	\$200,812.14	\$200,812.14

36. Charles Lockwood	#46	#47	#40
30. Charles Lockwood	9/12/23	9/12/23	9/12/23
37. Cole Lockwood	#49	#50	#44
37. Cole Lockwood	\$576,533.01	\$576,533.01	\$576,533.01
38. Sherle Lockwood	#44	#45	#39
38. Shelle Lockwood	\$766,041.83	\$766,041.83	\$766,041.83
39. Nikki Lockwood	#48	#49	#43
39. NIKKI LOCKWOOD	\$391,049.21	\$391,049.21	\$391,049.21
40. Lyndal VanBuskirk	#71	#78	#68
40. Lyndar vanbuskirk	\$494,432.51	\$494,432.51	\$494,432.51
41. Janet VanBuskirk	#83	#88	#72
41. Janet Vanduskirk	\$484,475.35	\$484,475.35	\$484,475.35
42. Colby VanBuskirk	#84	#89	#73
42. Coloy Valibuskiik	\$605,885.29	\$605,885.29	· -
43. Susan VanBuskirk	#84	#89	\$605,885.29 #73
43. Susan Vanduskirk	\$605,885.29	\$605,885.29	\$605,885.29
44 Limmy Char	#37	#38	#32
44. Jimmy Greer			
45. Dustin Johnson	\$354,918.73 #50	\$354,918.73 #51	\$354,918.73 #45
43. Dusun Johnson		_	
46 D D11	\$201,446.78	\$201,446.78	\$201,446.78
46. Dora Blackman	#32	#33	#27
47 Didasfield Conital Assat	\$53,651.36	\$53,651.36	\$53,651.36
47. Ridgefield Capital Asset	#74	#79	
Management L.P.	\$2,182,751.53	\$2,182,751.53	
48. Robert Ellis	#75	#80	
40 P: G G : 1	\$249,776.44	\$249,776.44	
49. Big Seven Capital	#80	#85	
Partners, LLC	\$594,403.47	\$594,403.47	
50. Carraway Cattle, LLC	#78	#83	
51 P: 1 1 G	\$489,298.48	\$489,298.48	
51. Richard Carraway	#79	#77	
	\$322,320.52	\$322,320.52	
52. Drew Phillips	#82	#87	
	\$517,777.89	\$517,777.89	
53. Barry Phillips	#76	#81	
	\$416,216.47	\$416,216.47	
54. Priest Cattle Company,	#67	#73	#66
Ltd.	\$709,680.77	\$709,680.77	\$709,680.77
55. Priest Victory Investment	#65	#70	#63
LLC	\$639,861.35	\$639,861.35	\$639,861.35
56. Wiley Roby Russell, Jr.,	#60	#64	#57
Trustee of the W. Robbie	\$1,500,864.65	\$1,500,864.65	\$1,500,864.65
Russell Living Trust			
57. Eddie Stewart	#61	#65	#58
	\$317,266.34	\$317,266.34	\$317,266.34

Facsimile:

Respectfully submitted,

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#### SPECIAL COUNSEL TO THE TRUSTEE

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on July 14, 2025,, a true and correct copy of the foregoing document was served by electronic transmission via the Court's CM/ECF system upon all parties in this adversary proceeding.

/s/ Hudson M. Jobe
Hudson M. Jobe